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Environmental Response Trust

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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)  
MOTORS LIQUIDATION COMPANY, et al., ) Chapter 11  
f/k/a General Motors Corp., et al. )  
) Case No. 09-50026 (REG)  
Debtors, )  
) Jointly Administered  
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AMENDED NOTICE OF APPEARANCE AND  
DEMAND FOR SERVICE OF PAPERS

S I R S:

PLEASE TAKE NOTICE that the Revitalizing Auto Communities Environmental Response Trust ("RACER") hereby appears by its counsel, Crowell & Moring LLP, and demands, pursuant to Section 1109(b) of the Bankruptcy Code and Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), that all notices given or required to be given in the case and all papers served or required to be served in the case, be given to and served upon the undersigned attorneys on its behalf, at the address set forth below, attention:

Steven B. Eichel, Esq.  
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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to the Bankruptcy Rules specified above, but also includes without limitation, orders and notices of any application, motion, petition, pleading, request, objection, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, delivery, telephone, telex or otherwise which affect or seek to affect in any way the debtor or its successor or property or proceeds in which the debtor or its successor may claim an interest.

PLEASE TAKE FURTHER NOTICE that neither this Amended Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to subject RACER to the jurisdiction of the Bankruptcy Court or waive RACER's (i) right to have final orders in non-core matters entered only after de novo review by a district judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which RACER is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

PLEASE TAKE FURTHER NOTICE, that RACER withdraws the appearance of Michael Blumenthal, Esq. on its behalf and requests that Michael Blumenthal, Esq. be removed from the ECF notification on behalf of RACER in the above-captioned case.

Dated: New York, New York  
July 24, 2012

Respectfully Submitted,

CROWELL & MORING LLP  
590 Madison Avenue, 20th Floor  
New York, New York 10022  
(212) 223-4000 Tel

By: /s/ Steven B. Eichel  
Steven B. Eichel  
Attorneys for Revitalizing Auto Communities  
Environmental Response Trust